

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LIGATION	Civil Action No.: 2:12-md-02327 MDL No. 2327
THIS DOCUMENT RELATES TO PLAINTIFFS: MARY M. AKINS, ET AL., V. ETHICON, INC., ET AL. CIVIL ACTION NO.: 2:14-CV-14182; LISA D. HUDSPETH, ET AL., V. ETHICON, INC., ET AL. CIVIL ACTION NO.: 2:15-CV-04163; KATHLEEN KRAUSE ET AL., V. ETHICON, INC., ET AL. CIVIL ACTION NO.: 2:14-CV-10191; PAMELA J. OLSEN ET AL., V. ETHICON, INC., ET AL. CIVIL ACTION NO.: 2:13-CV-12636; COLLEEN S. PASEKA, V. ETHICON, INC., ET AL., CIVIL ACTION NO.: 2:13-CV-13451; DIANN REPKA ET AL., V. ETHICON, INC., ET AL. CIVIL ACTION NO.: 2:13-CV-26198; MARIANNE L. SIEGRIST, ET AL., V. ETHICON, INC., ET AL. CIVIL ACTION NO.: 2:14-CV-17889; JULIE SKEENS ET AL., V. ETHICON, INC., ET AL. CIVIL ACTION NO.: 2:12-CV-01643; STACIE THOMPSON, ET AL., V. ETHICON, INC., ET AL. CIVIL ACTION NO.: 2:14-CV-07855; IRMA I. TOWNSON ET AL., V. ETHICON, INC., ET AL. CIVIL ACTION NO.: 2:13-CV-12954;	

**PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION
FOR ORDER REGARDING DISPOSITION OF NON-
REVISION GYNECARE TVT PRODUCTS CASES**

NOW COME the above-referenced Plaintiffs, by and through the undersigned counsel, and in response to the motion of the Defendants, Ethicon, Inc. and Johnson & Johnson (“Ethicon”) regarding the disposition of non-revision Gynecare TVT Products Cases (ECF Doc. 5313) set forth the following:

On March 2, 2018, Ethicon filed *Defendants’ Motion for Order Regarding Disposition of Non-Revision Gynecare TVT Products Cases* (ECF Doc. 5313), which proposes a disposition of cases in which the plaintiff has not undergone a revision procedure. Accompanying the motion as Exhibit A is a list of cases that Ethicon maintains are cases in which the plaintiff has a Gynecare TVT product implanted and has had no revision procedure performed.

The above-named plaintiffs are included in Ethicon’s list of plaintiffs who have not undergone a revision procedure. Each of the above-named plaintiffs have in fact undergone a revision procedure, or other(s) qualifying procedures, and are not properly included in Ethicon’s motion. Plaintiffs file this response to preserve their claims and avoid dismissal to the extent that Ethicon’s motion is granted.

Dated: March 16, 2018

Respectfully submitted,

Waters & Kraus LLP

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CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL

Respectfully submitted,

Waters & Kraus LLP

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